UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Southern Africa Enterprise)	
Development Fund,)	
D1 : .:.cc)	
Plaintiff)	
v.)))	C.A. No. 21-cv-1463-GBW
Ironshore Specialty Insurance)	
Company,)	
)	
Defendant.)	

STIPULATION AND [PROPOSED] ORDER TO AMEND THE SCHEDULE

IT IS HEREBY STIPULATED, subject to the approval of the Court, that the June 12, 2023 First Amended Scheduling Order (D.I. 28) be amended as follows to accommodate witness and attorney schedules around the holidays. The remainder of the dates and deadlines in the First Amended Scheduling Order (D.I. 28), including for Dispositive Motions and Trial, are not altered by this Stipulation.

Event	Current Date	Proposed Amended		
		<u>Date</u>		
Fact Discovery Cut Off	December 1, 2023	January 19, 2024		
Plaintiffs' Expert	December 22, 2023	January 22, 2024		
Disclosures				
Defendant's Expert	January 22, 2024	February 22, 2024		
Disclosures		·		
Rebuttal or Supplemental	February 19, 2024	March 8, 2024		
Disclosures				
Expert Discovery Cut Off	March 15, 2024	March 22, 2024		

Date: November 14, 2023 Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

COOCH AND TAYLOR, P.A.

/s/ Jody C. Barillare

Jody C. Barillare (#5107) 1007 North Orange Street, Suite 501 Wilmington, DE 19801 (302) 574-3000 jody.barillare@morganlewis.com

Ariane Baczynski (*pro hac vice*)
1 Federal Street
Boston, MA 02110
(617) 341-7700
ariane.baczynski@morganlewis.com

Attorneys for Plaintiff Southern Africa Enterprise Development Fund

/s/ R. Grant Dick IV

James W. Semple (#396)
R. Grant Dick IV (#5123)
The Brandywine Building
1000 N. West Street, Suite 15000
Wilmington, DE 19801
(302) 984-3800
jsemple@coochtaylor.com
gdick@coochtaylor.com

GOODELL, DEVRIES, LEECH & DANN LLP

Linda S. Woolf (pro hac vice) Kamil Ismail (pro hac vice) One South Street, 20th Floor Baltimore, MD 21202 (410) 783-4000 lsw@gdldlaw.com kxi@gdldlaw.com

Attorneys for Defendant Ironshore Specialty Insurance Company

SO ORDERED this	day	of l	Novem	ber,	2023.
-----------------	-----	------	-------	------	-------

The Honorable Gregory B. Williams United States District Judge